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RE: Petition to suspend or revoke Permit no. C1993017.

Director Dorrington, Bureau Chief Walsh, and Section Supervisor Smith,

We write to petition the Montana Department of Environmental Quality (“DEQ”) to revoke Permit no. C1993017, held by Signal Peak Energy, LLC (“SPE”) for the Bull Mountains Mine as improvidently issued. Evidence from a recent federal criminal prosecution against SPE and various directors of the company, and other publicly available information, indicate that Signal Peak is in ongoing violation of the Montana Strip and Underground Mine Reclamation Act (“MSUMRA”) and the Surface Mining Control and Reclamation Act (“SMCRA”) at the mine. Specifically, evidence indicates that SPE (1) falsified its certification of compliance with MSUMRA, (2) failed to abate unlawful disposal of toxic waste, (3) is violating regulations regarding lawful discharge of polluted water; (4) is violating permit requirements for evaluating impacts to the hydrologic balance; and (5) is violating the requirement to disclose the identity of mine owners—in particular SPE has not disclosed who owns the Gunvor Group, Ltd., an international commodities trader that owns a one-third interest in the mine and that the U.S. government has repeatedly linked to the current Russian regime.

Consequently, and pursuant to Mont. Code Ann. § 82-4-251, and Montana Administrative Rules (“ARM”) 17.24.406-407, Montana Environmental Information Center, Northern Plains Resource Council, Sierra Club, and WildEarth Guardians (collectively “Petitioners”) request that DEQ suspend or revoke Permit no. C1993017. Petitioners have, through separate communication, requested the Federal Office of Surface Mining Reclamation and Enforcement (“OSMRE”) perform a federal inspection of this mine (or in the alternative require DEQ to grant a citizen inspection within ten days), and issue an order requiring SPE to immediately cease the company’s destructive and lawless operations at the Bull Mountains Mine.

LEGAL STANDARD

The Montana Code requires the Director or his authorized representative to suspend a mining permit where:

[A]ny condition or practice exists in violation of any requirement of this part or any permit condition required by this part that creates an imminent danger to the health or safety of the public or is causing or can reasonably be expected to cause significant and imminent environmental harm to land, air, or water resources.

Mont. Code Ann. § 82-4-251.

Moreover, the Montana Administrative Rules provide that if DEQ “has reason to believe that it improvidently issued an operating permit, it shall review the circumstances under which the permit was issued,” and if it determines that the permit was improvidently issued, it shall impose one or more remedial measures, up to and including suspension and revocation of the permit. ARM 17.24.406 (1)-(3) (providing procedure for determination and remedial measures short of revocation); 14.26.407 (providing for revocation of improvidently issued permit).

The DEQ’s regulatory provisions implementing MSUMRA also require an applicant for a mining permit to, among numerous other conditions, provide complete and accurate information regarding the applicant and its associates. ARM 17.24.303(l), (m).

ANALYSIS

Based on information from SPE’s recent criminal proceedings, sworn testimony from quasi-judicial proceedings, and information from the U.S. Environmental Protection Agency (“EPA”) and other sources, we have reason to believe SPE is operating in violation of SMCRA, MSUMRA, and its permit.

First, SPE appears to have knowingly filed a false certification in support of its permit application. SMCRA and MSUMRA require a permit applicant to swear under oath to the accuracy of the information submitted in the permit application. 30 C.F.R. § 778.9(b); ARM 17.24.303(1)(m). This includes a sworn certification that the permit applicant, its affiliates, operators, and employees are not in violation of any provision of SMCRA or MSUMRA or any provision of a permit issued under either law. ARM 17.24.303(1), (m); Mont. Code Ann. § 82-4-251(1). This information is critical because the regulatory authority must deny a permit application if (1) the applicant is “in violation of Public Law 95-87 [SMCRA], as amended, any state law required by Public Law 95-87 [MSUMRA], as amended, or any law, rule, or regulation of the United States or of any department or agency in the United States pertaining to air or water environmental protection” or (2) the applicant “has demonstrated a pattern of willful violations of Public Law 95-87 [SMCRA], as amended, or any state law required by Public Law 95-87 [MSUMRA], as amended, when the nature and duration of the violations and resulting irreparable damage to the environment indicate an intent not to comply with the provisions of this part.” Mont. Code Ann. § 82-4-227(11), (12).

Here, evidence indicates that SPE's sworn certification of compliance with SMCRA, MSUMRA, and other environmental protection laws, which the company submitted in 2013 and relied on again in 2016 was false and, further, the SPE knowingly submitted the false certification to the DEQ. Specifically, SPE's then-President and CEO, John DeMichiei submitted a sworn certification in 2013 and 2014 (and again when SPE resubmitted its application in 2016) that no "subsidiary, affiliate, or person" controlled by or under common control of SPE or any "officer, partner, or any individual owning" ten percent of stock in SPE was subject to Mont. Code Ann. § 82-4-251(1), which requires compliance with all provisions of MSUMRA and permits issued pursuant to the law. Based at least in part on this certification, DEQ determined that SPE was not in violation of SMCRA, MSUMRA, or laws of environmental protection, and that the company did not have a pattern of violations of SMCRA or MSUMRA. Mont. Code Ann. § 82-4-227(11)-(12). However, at the time that SPE submitted this certification, evidence indicates that it was habitually committing knowing violations of health and safety laws, including, the requirements of MSUMRA and SPE's own permit regarding proper disposal of waste. In the recent criminal prosecution of SPE (which resulted in a guilty plea, a \$1,000,000 fine, and probation), the U.S. Attorney's Office submitted the following offer of proof:

From approximately 2013 until 2018 Signal Peak Energy, LLC, an operator of a coal mine located outside of Roundup, Montana which is subject to the Mine Safety and Health Act, habitually violated mandatory health and safety standards applicable to the operation of the mine. These violations consisted of both standards regarding environmental safety and worker safety. **These violations occurred with the full knowledge, direction, and participation of the most senior management of the mine during that period, including the President and CEO, the Vice President of Surface Operations, the Vice President of Underground Operations, and the Safety Manager.**

In the Summer months of 2013, as a part of these habitual violations, senior managers of Signal Peak Energy, LLC directed mine employees to improperly dispose of mine waste by pumping the waste into abandoned sections of the mine. This waste, known colloquially as "slurry," consisted of wastewater, industrial chemicals used in the mining process, and unprocessed soil containing heavy metals including arsenic and lead over groundwater tolerances.

Mine employees pumped this slurry into the abandoned section of the mine for up to approximately two weeks. Several employees later stated that they pumped this slurry into this abandoned section of the mine until the section was full and could hold no additional mine waste. Disposing mine waste in this manner legally required approval of both the Mine Health and Safety Administration (MSHA) and the Environmental Protection Agency (EPA) which Signal Peak Energy did not obtain. As such, by disposing of the mine waste in this manner without approval, Signal Peak willfully violated a mandatory safety standard applicable to the mine.

A similar incident occurred in the Spring of 2015. On this occasion, agents of Signal Peak Energy, LLC commissioned the drilling of two bore holes into the ground that led to another abandoned section of the mine. Senior managers of Signal Peak Energy, LLC directed mine employees to pump more "slurry" mine waste into the

abandoned section through the bore holes. This “slurry” had the same basic composition as the “slurry” improperly disposed of in 2013. Estimates vary, but this pumping occurred for up to six weeks. In this case, the pumping was discontinued after a witness discovered that seals between the abandoned mine works and the operating mine had been breached, causing flooding in areas of the operating mine. Signal Peak Energy, LLC obtained a permit to inject water in the ground via these bore holes but this permit did not allow for the disposal of this “slurry” mine waste. As such, by once again disposing of the mine waste in this manner without approval, Signal Peak was willfully violating a mandatory safety standard applicable to the mine.

Offer of Proof, *United States v. Signal Peak Energy, LLC*, No. CR-21-79 (Oct. 5, 2021) (attached as Exhibit 1).¹ Before discussing how this criminal conduct violated SMCRA and MSUMRA, it must be noted that this was not an isolated incident. The U.S. Attorney who secured the conviction described the atmosphere of lawlessness that has prevailed at the Bull Mountains Mine:

“This case holds Signal Peak Mine accountable for its utter disregard for environmental and worker health and safety standards. Mine owners provided little in the way of meaningful oversight of mine operations as long as the mine’s managers could meet reported safety and production goals,” U.S. Attorney Leif M. Johnson said in a broad summary of the case. “That lax oversight fostered a climate of fraud, which today cost the mine \$1 million in fines. **In addition, mine managers lied about the mine’s expenses, its safety record, and other matters, which separately resulted in individual criminal convictions and charges for nine persons, including former mine vice presidents and their associates, on crimes ranging from embezzlement, tax evasion and bank fraud to money laundering, drugs and firearms violations.**”²

While these allegations detail violations of criminal laws related to mine safety, it is of even greater relevance to DEQ that SPE’s SMCRA permit did not allow coal waste contaminated with industrial chemicals and heavy metals to be pumped into the mine as a mechanism of disposal

¹ Troublingly, these were not Signal Peak’s first violation of worker safety standards. Between 2008 and 2022, Signal Peak was cited for over **1,600 mine safety violations**. MSHA Violations (Exhibit 2), *available at* <https://www.msha.gov/mine-data-retrieval-system>; *see also* Derf Johnson, Signal Peak Energy Violates Safety Standards and Disputes Fines, MEIC (May 8, 2013), *available at* <https://meic.org/signal-peak-energy-violates-safety-standards-disputes-fines/>. At least one such violation resulted in the death of an employee. U.S. Dep’t of Labor Mine Safety and Health Admin., Report of Investigation (Jan. 2, 2010) (CAI-2010-01), *available at* https://www.msha.gov/sites/default/files/Data_Reports/Fatals/Coal/2010/ftl10c01_0.pdf. Despite SPE’s criminal efforts to conceal evidence of accidents at the mine, at least 122 accidents have been reported since the mine began operating in 2008. MSHA, Accidents (Exhibit 3), *available at* <https://www.msha.gov/mine-data-retrieval-system>.

² Tom Lutey, Signal Peak Fined \$1 Million for Safety, Pollution Violations, Billings Gazette (Jan. 31, 2022) (Exhibit 4).

(as the offer of proof suggests). As such, SPE's disposal of this waste in the mine was also a violation of SMCRA and MSUMRA. Accordingly, the U.S. Attorney's offer of proof demonstrates that SPE's sworn certification that it was complying with SMCRA and MSUMRA in 2013 and 2016 was false—at the same time SPE provided a sworn statement that it was complying with the law, its directors were knowingly violating the law—in further violation of the law. Such deceitful and environmentally harmful conduct is anathema to SMCRA and MSUMRA and constitutes grounds for suspension and revocation of SPE's permit. ARM 17.24.406(1)-(3) to 407(1). It certainly “demonstrate[s] a pattern of willful violations” of MSUMRA, as well as other laws, indicating “an intent not to comply with the provisions” of MSUMRA. Mont. Code Ann. § 82-4-227(12). That Montana regulators have taken no action related to SPE's nearly decade-long pattern of criminal conduct undermines public trust and confidence in state regulators.^{3,4}

Second, this same information from SPE's criminal prosecution indicates that the company has for years been disposing of toxic mine processing waste in violation of its permit, SMCRA, and MSUMRA. SPE's permit requires the company to dispose of mine waste, including underground development waste and coal processing waste, in the waste disposal area (WDA). SPE Permit at 920-1 (“The permittee proposes to dispose of underground development waste with coal processing waste in the Waste Disposal Areas (WDAs) illustrated on Maps 901-1 and 901-1A.”); 920-6 (“All mine development waste and coal processing waste will be permanently disposed of in the WDAs illustrated on Map 901-1 and 901-1A.”); 920-7 (“Material from all sources will be intermixed in the WDAs for final disposal.”). The permit does not allow disposal of coal waste in the mine. *Id.* at 920-1. This is because, among other things, “[b]ackstowing of coal processing waste products would include non-marketable coal fines” and would “unnecessarily endanger the workforce, increasing the risk of spontaneous combustion or fire.” *Id.* Moreover, SPE has proposed using the “mine pool” as a source of replacement water for springs or wells that are impacted by mining operations. SPE Permit, App. 313-2-4. Neither DEQ nor SPE assessed the hydrologic impacts of storing mine waste in the mine void in the probable hydrologic consequences report or the cumulative hydrologic impact assessment.

Violation of a permit requirement is a violation of SMCRA and MSUMRA. 30 U.S.C. § 1271(a)(1); Mont. Code Ann. § 82-4-251(1). There is no indication that SPE has in any way abated this violation by removing the toxic slurry that it knowingly pumped into a geological

³ Such dishonesty regarding ongoing violations, discovered after issuance of a permit, is a basis for suspension and revocation of the improvidently issued permits, which should also occur here. ARM 17.24.406(2)-(3), .407.

⁴ As noted above, in addition to and apart from this petition for revocation, Petitioners have requested an immediate inspection by OSMRE to determine whether SPE has corrected its false certification in its permit application and by extension a cessation order from OSMRE halting operations at the mine until this violation is corrected. Petitioners have also, contemporaneously with this petition, filed an associated request for inspection by DEQ and request for issuance of an immediate cessation order.

layer that the company has identified as a source of replacement water.⁵ SPE's blatant disregard for the environment, the public, and those who rely on the water resources of the Bull Mountains is a repeated practice of the company. When SPE dewatered a well used for stock watering in 2019, it initially provided replacement water contaminated with oil.⁶

Also as noted above, in addition to and apart from this petition for revocation, Petitioners have requested an immediate inspection to determine whether SPE has corrected its false certification in its permit application and by extension a cessation order from OSMRE halting operations at the mine until this violation is corrected. Petitioners have also, contemporaneously with this Petition, requested an inspection and cessation order from DEQ.

Third, information from EPA indicates a pattern of violations of environmental protection laws, including the Clean Water Act ("CWA"), the Safe Drinking Water Act ("SDWA"), and MSUMRA. MSUMRA performance standards require discharges to "be in compliance with all federal and state laws and regulations and applicable effluent limitations." ARM 17.24.633(4). Moreover, the permittee must conduct operations to prevent "material damage" to the hydrologic balance outside the permit area. *Id.* 17.24.631(1). Material damage includes violation of any water quality standards. Mont. Code Ann. § 82-4-203(31). Further, as noted, an applicant may not obtain a permit if it is in violation of MSUMRA or other environmental protection laws. *Id.* § 82-4-227(11). Nor may an applicant obtain a permit if it has demonstrated a pattern of violations indicative of its intent to not follow the requirements of MSUMRA. *Id.* § 82-4-227(12).

SPE's disregard for environmental protection laws, among others, is further demonstrated by its repeated violations of effluent limitations and other requirements of the CWA and SDWA. According to EPA records, SPE has been and continues to be in violation of the CWA for 12 of the last 12 quarters and in violation of the SDWA for 7 of the last 12 quarters.⁷ While DEQ has issued multiple violation letters to SPE, the agency has taken no formal enforcement action against the company for any of these violations, further eroding public confidence in the agency's ability to police this operation. SPE has had 71 days of violations of effluent limitations from outfalls 1, 2, 8, and 10 since 2013, in violation of the CWA and MSUMRA.⁸ The pollutants discharged in excessive quantities are settleable solids, suspended solids, iron, pH, and oil and grease. SPE has on multiple occasions discharged pollutants in excess of 1000% of applicable

⁵ The mine has damaged numerous water resources above the mine, relied upon by ranching operations above the mine, as well as wildlife.

⁶ As with respect to section 1, *supra*, in addition to and apart from this petition for revocation, Petitioners have requested an immediate inspection to determine whether SPE has corrected its false certification in its permit application and by extension a cessation order from OSMRE halting operations at the mine until this violation is corrected.

⁷ EPA, Enforcement Compliance History Online ("ECHO"), Signal Peak Energy—Bull Mountains No. 1 (attached as Exhibit 5).

⁸ EPA, Effluent Limit Exceedances Report (May 13, 2022) (Exhibit 6).

limits.⁹ SPE has also repeatedly discharged stormwater in excess of effluent limits for iron, aluminum, and suspended solids. In the last 12 quarters, SPE's aluminum discharges have exceeded limits by 245%, 2,200%, 83%, 940%, and 1,860%. SPE's iron discharges have exceeded limits by 280%, 2,650%, 129%, 1,130%, and 2,130%. SPE's suspended solids discharges have exceeded effluent limits by 242%, 592%, 910%, 173%, and 454%.

SPE's pollution discharges have violated and continue to violate monitoring and reporting requirements of the CWA, which are also violations of MSUMRA. ARM 17.24.633(4). SPE committed unauthorized discharges and reporting violations and failed to submit CWA monitoring reports in 2020 and 2021, and, since 2019, the company has been in continuous violation for failing to submit annual reports required by its stormwater permit.^{10,11}

During this same period of time, SPE was in continuous violation of its MSUMRA permit requirements for monitoring impacts to water resources from mining. SPE's permit requires the company to conduct detailed quantitative analyses of impacts to water resources above the mine, including detailed analyses of water quantity, aquatic life, vegetation, and wildlife use at springs above the mine and reference springs. SPE Permit App. 313-4 (Exhibit 7). SPE's contractors admitted under oath that the company has never—not once—over the course of more than a decade, complied with this design standard (i.e., requirement) of its permit.¹² Worse, this unlawful conduct was perpetrated with the full knowledge and approval of DEQ, further undermining public confidence in the regulatory authority.¹³ After this ongoing violation came to light, SPE and DEQ attempted to surreptitiously remove these critical provisions for assessing impacts to the hydrologic balance from the permit via a minor revision, without public notice or comment. This was one of approximately 280 minor revisions that SPE and DEQ have made to the permit without public oversight over the past ten years—which is an abuse both by SPE and DEQ. However, because this dramatic change to and removal of the methods for assessing impacts to the hydrologic balance may affect the hydrologic balance, DEQ and SPE could not have used a minor revision to accomplish this change in the absence of a major revision and public scrutiny. ARM 17.24.301(66), (72). As such, the supposed change is void *ab initio* and SPE remains in violation of the permit provisions for assessing impacts to the hydrologic balance. DEQ's and SPE's attempt to substantially alter and weaken the methods for assessing impacts to water resources is all the more inexcusable because SPE has a long history of violating monitoring requirements. In 2019, SPE unilaterally decided to cease monitoring water

⁹ EPA, ECHO, Signal Peak Energy—Bull Mountains No. 1.

¹⁰ *Id.*

¹¹ As with respect to section 2, *supra*, in addition to and apart from this petition for revocation, Petitioners have requested an immediate inspection to determine whether SPE has corrected its false certification in its permit application and by extension a cessation order from OSMRE halting operations at the mine until this violation is corrected.

¹² Hrg. Tr. at 769, 786-87, 893 (Exhibit 8).

¹³ *Id.* at 787 (“[T]o unpack that, even though this is still part of the permit, it’s not followed, and DEQ—it’s your understanding that DEQ doesn’t require it to be followed? A. That is my understanding.”).

resources in winter months, which resulted in a notice of noncompliance from DEQ (which the agency and SPE ultimately settled, again hidden from the view of the public). Prior to that, SPE had violated monitoring requirements for assessing impacts at Litsky Spring, the first major spring to be undermined, preventing DEQ from making any determination of whether the spring had been impacted.^{14,15}

Publicly available information further indicates that SPE is currently in violation of its obligation to fully disclose those who own and control the mine. ARM 17.24.303(1)(g); ARM 17.24.301(83). SPE's permit indicates that 33.3% of the company is owned by Pinesdale, LLC, which is, in turn, wholly owned by Gunvor Group, Ltd. SPE Permit tbl. 303-4(e). The permit fails, however, to identify any of the owners of Gunvor. This is a glaring problem because the U.S. government has repeatedly asserted a connection between Gunvor and the current Russian regime, including Vladimir Putin. The U.S. Department of Treasury wrote in a press release in 2014: "Putin has investments in Gunvor and may have access to Gunvor funds."¹⁶ As one author recently wrote: "If we are to believe an old rumor, denied but nevertheless spread through the heart of American diplomacy (and then via Wikileaks), ... the Russian president took a cut from each barrel exported from Russia, through the Swiss trading company Gunvor, which was once headed by a former KGB colleague."¹⁷ U.S. State Department cables from 2008 alleged that Gunvor is "just a front for 'massive corruption.'"¹⁸ Other investigations have found further evidence of this connection.¹⁹ This demonstrates the necessity of full disclosure of the owners of Gunvor. At present, the United States has placed sanctions on the Russian regime and the Montana Governor's office has stated an intention not to support Russia's war with Ukraine by "removing any benefit that supports or advances Russia's vicious war machine."²⁰ Notably, recent news reports suggest that Gunvor may be helping Russian crude oil reach world

¹⁴ Expert Disclosure of Peter Schade at 7 (Exhibit 9).

¹⁵ As with respect to section 3, *supra*, in addition to and apart from this petition for revocation, Petitioners have requested an immediate inspection to determine whether SPE has corrected its false certification in its permit application and by extension a cessation order from OSMRE halting operations at the mine until this violation is corrected.

¹⁶ U.S. Dep't of Treasury, Press Release, Treasury Sanctions Russian Officials (Mar. 20, 2014) (Exhibit 10).

¹⁷ Matthieu Auzanneau, *Oil, Power, and War: A Dark History* 527 (2018) (excerpts attached as Exhibit 11).

¹⁸ Christopher Matthews & Andrew Grossman, U.S. Money Laundering Probe Touches Putin's Inner Circle, *Wall Street Journal* (Nov. 5, 2014) (Exhibit 12).

¹⁹ *E.g.*, Public Eye, *Gunvor in Congo* (2017) (Exhibit 13) (detailing connections between Gunvor and Putin and noting that, while Gunvor has publicly "kept denying having any connection with the Kremlin," Gunvor representatives were "using this very same connection to persuade the Congolese authorities to engage in dealings with them").

²⁰ State of Montana Newsroom, Gov. Gianforte Formally Launches Process to Divest Russian Assets (Mar. 2, 2022), https://news.mt.gov/Governors-Office/Gov_Gianforte_Formally_Launches_Process_to_Divest_Russian_Assets.

markets.²¹ In short, it is critical that SPE disclose the entire structure of ownership and control of Gunvor to assure compliance with MSMRA.

Petitioners request DEQ to revoke Permit no. C1993017, held by Signal Peak Energy, LLC (“SPE”) for the Bull Mountains Mine as improvidently issued.

CONCLUSION

It is clear that at every level SPE and its owners have had a fraught relationship with the law. The evidence cited above demonstrates a clear pattern of unlawful and ongoing conduct at SPE. Accordingly, Montana Environmental Information Center, Northern Plains Resource Council, Sierra Club, and WildEarth Guardians respectfully request that SPE’s permit be revoked under the ample authority provided by Mont. Code Ann. § 82-4-251 and ARM 17.24.406(1)-(3) to 407(1). As noted previously, this petition accompanies a request to the OSMRE to initiate a federal inspection of the mine and, following such inspection, to issue a cessation order pending correction of the violations noted herein. Further, this petition is filed contemporaneously with a parallel request for inspection and cessation of operations by DEQ.

We appreciate DEQ’s efforts to ensure that SPE complies with state and federal law. If there is anything we can do to expedite the process, please contact us.

Sincerely,

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²¹ Julia Simon, NPR, *Despite U.S. Sanctions, Oil Traders Help Russian Oil Reach Global Markets* (Apr. 22, 2022) (Exhibit 14).

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